

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
Lordstown Motors Corp., <i>et al.</i> , ¹)	
)	Case No. 23-10831 (MFW)
)	
Debtors.)	(Joint Administration Requested)
)	

**NOTICE OF (I) FILING OF BANKRUPTCY PETITIONS AND RELATED
DOCUMENTS AND (II) AGENDA FOR HEARING ON FIRST DAY MOTIONS
SCHEDULED FOR JUNE 28, 2023 AT 3:00 P.M. (EASTERN DAYLIGHT TIME),
BEFORE THE HONORABLE MARY F. WALRATH, AT THE UNITED STATES
BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE²**

**THE REMOTE HEARING WILL BE CONDUCTED ENTIRELY BY ZOOM AND
REQUIRES ALL PARTICIPANTS TO REGISTER IN ADVANCE. COURTCALL WILL
NOT BE USED TO DIAL IN.**

PLEASE USE THE FOLLOWING LINK TO REGISTER FOR THE HEARING:

<https://debuscourts.zoomgov.com/meeting/register/vJIsceqtrD4uHQoIiJio0rZ02R1lj6KNSL8>

**ONCE REGISTERED, PARTIES WILL RECEIVE A CONFIRMATION EMAIL
CONTAINING PERSONAL LOG-IN INFORMATION FOR THE HEARING.**

PLEASE TAKE NOTICE that on June 27, 2023, the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) filed the following voluntary petitions (collectively, the “**Petitions**”) for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532:

A. Voluntary Petitions:

1. [Lordstown Motors Corp.](#)
2. [Lordstown EV Corporation](#)

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

² All motions and other pleadings referenced herein are available online at the following address: <https://www.kccllc.net/lordstown>.

3. [Lordstown EV Sales LLC](#)

PLEASE TAKE FURTHER NOTICE that in addition to filing the Petitions, the Debtors filed the following first day motions and related documents (collectively, the “**First Day Motions**”):

B. First Day Declaration:

4. Declaration of Adam Kroll in Support of the Debtors’ Chapter 11 Petitions and First Day Motions [[Docket No. 15](#); filed June 27, 2023]

C. First Day Motions:

5. Debtors’ Motion for Entry of an Order Directing Joint Administration of the Chapter 11 Cases [[Docket No. 2](#); filed June 27, 2023]
6. Debtors’ Application for Entry of an Order Appointing Kurtzman Carson Consultants LLC as Claims and Noticing Agent Effective as of the Petition Date [[Docket No. 4](#); filed June 27, 2023]
7. Debtors’ Motion for Entry of an Order (A) Authorizing, But Not Directing, the Debtors to (I) Confirm, Restate, and Enforce the Worldwide Automatic Stay, Anti-Discrimination Provisions, and *ipso facto* Protections of the Bankruptcy Code, and (II) Use the Form and Manner of Notice, and (B) Granting Other Related Relief [[Docket No. 5](#); filed June 27, 2023]
8. Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing, But Not Directing, the Debtors to (I) Pay Prepetition Wages and Compensation; (II) Continue Certain Employee Benefits and Incentive Programs; (III) Continue Certain Health and Insurance Benefits; and (B) Granting Other Related Relief [[Docket No. 6](#); filed June 27, 2023]
9. Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing, But Not Directing, the Debtors to (I) Waive Requirements to File a List of, and Provide Notice to, All Equity Holders, (II) Redact Certain Personal Identification Information for Individual Creditors, and (B) Granting Other Related Relief [[Docket No. 7](#); filed June 27, 2023]
10. Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing, But Not Directing, the Debtors to (I) Continue Use of Existing Cash Management System, Bank Accounts, and Business Forms, (II) Pay Related Prepetition Obligations, and (III) Continue Intercompany Transactions; (B) Waiving the Section 345(b) Deposit and Investment Requirements; and (C) Granting Other Related Relief [[Docket No. 8](#); filed June 27, 2023]
11. Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing, But Not Directing, the Debtors to Pay Prepetition Claims of Critical Vendors, (B) Confirming Administrative Expense Priority Status for Outstanding

Prepetition Purchase Orders, and (C) Granting Other Related Relief [[Docket No. 9](#); filed June 27, 2023]

12. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing, But Not Directing, the Payment of Certain Prepetition Taxes and Fees and (II) Granting Other Related Relief [[Docket No. 10](#); filed June 27, 2023]
13. Debtors' Motion for Entry of Interim and Final Orders (A) Approving the Debtors' Proposed Form of Adequate Assurance of Payment to Utility Providers, (B) Establishing Procedures for Resolving Objections by Utility Providers, (C) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Services, and (D) Granting Other Related Relief [[Docket No. 11](#); filed June 27, 2023]
14. Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing, But Not Directing the Debtors to (I) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder and (II) Renew, Revise, Extend, Supplement, Change or Enter into New Insurance Policies, (B) Modifying Automatic Stay with Respect to Workers' Compensation Programs, and (C) Granting Other Related Relief [[Docket No. 12](#); filed June 27, 2023]
15. Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing, But Not Directing, the Debtors to (I) Maintain their Existing Warranty Programs and (II) Honor Certain Customer Obligations and (B) Granting Other Related Relief [[Docket No. 13](#); filed June 27, 2023]
16. Debtors' Motion for Entry of Interim and Final Orders (A) Establishing Notice and Hearing Procedures for Trading in Equity Securities in the Debtors and (B) Granting Other Related Relief [[Docket No. 14](#); filed June 27, 2023]

PLEASE TAKE FURTHER NOTICE that a hearing with respect to the First Day Motions is scheduled for June 28, 2023 at 3:00 p.m. (Eastern Daylight Time) before The Honorable Mary F. Walrath, United States Bankruptcy Judge for the District of Delaware (the **"First Day Hearing"**). Parties who wish to participate in the First Day Hearing may do so by joining the Zoom hearing at:

<https://debuscourts.zoomgov.com/meeting/register/vJIsceqtrD4uHQoIiJio0rZ02R1lj6KNSL8>

PLEASE TAKE FURTHER NOTICE that objections, if any, to the First Day Motions may be made at the First Day Hearing.

Dated: June 27, 2023

Respectfully submitted,

/s/ Daniel J. DeFranceschi

RICHARDS, LAYTON & FINGER, P.A.

Kevin Gross (No. 209)
Daniel J. DeFranceschi (No. 2732)
Paul N. Heath (No. 3704)
Amanda R. Steele (No. 5530)
Jason M. Madron (No. 4431)
One Rodney Square
920 N. King Street
Wilmington, DE 19801
Telephone: (302) 651-7700
Facsimile: (302) 651-7701
gross@rlf.com
defranceschi@rlf.com
heath@rlf.com
steele@rlf.com
madron@rlf.com

WHITE & CASE LLP

Thomas E Lauria (*pro hac vice* application pending)
Matthew C. Brown (*pro hac vice* application pending)
Fan B. He (*pro hac vice* application pending)
200 South Biscayne Boulevard, Suite 4900
Miami, FL 33131
Telephone: (305) 371-2700
tlauria@whitecase.com
mbrown@whitecase.com
fhe@whitecase.com

David M. Turetsky (*pro hac vice* application pending)
1221 Avenue of the Americas
New York, NY 10020
Telephone: (212) 819-8200
david.turetsky@whitecase.com

Jason N. Zakia (*pro hac vice* application pending)
111 South Wacker Drive, Suite 5100
Chicago, IL 60606
Telephone: (312) 881-5400
jzakia@whitecase.com

Roberto Kampfner (*pro hac vice* application pending)
Doah Kim (*pro hac vice* application pending)
RJ Szuba (*pro hac vice* application pending)
555 South Flower Street, Suite 2700
Los Angeles, CA 90071
Telephone: (213) 620-7700
rkampfner@whitecase.com
doah.kim@whitecase.com
rj.szuba@whitecase.com

*Proposed Co-Counsel to Debtors and
Debtors-in-Possession*